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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10

11 JOHN DOBBINS; individually and as
12 successor in interest to JENNIFER
DOBBINS, Decedent,

13 Plaintiffs,

14 v.

15 COUNTY OF RIVERSIDE; JOHN
16 BARTO; and DOES 1-10, inclusive,

17 Defendants.
18
19

Case No. 5:25-cv-01444-JGB-DTB

**DEFENDANTS' REPLY TO
PLAINTIFF'S OPPOSITION TO
MOTION TO STAY THE CASE**

Judge: Jesus G. Bernal

Date: November 24, 2025
Time: 9:00 a.m.
Crtrm.: 1

1 Defendants COUNTY OF RIVERSIDE and JOHN BARTO (collectively,
2 “Defendants”) hereby submit the following Reply Brief in Support of Defendants’
3 Motion to Stay.

4
5 Dated: November 10, 2025

BURKE, WILLIAMS & SORESENSEN, LLP

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8 By: /s/ Caylin W. Jones
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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

As Plaintiff's Opposition notes, this is an "unusual" case where criminal defendant Eric Nourani and decedent Jennifer Dobbins simultaneously attacked Deputy John Barto on June 11, 2024. On that date around 1:05 a.m. Deputy John Barto was working patrol in the area of Sixth Street and Paseo Grande in the City of Corona. Deputy Barto was in his patrol vehicle when he noticed two people hiding in the bushes at the Larry Miller Toyota dealership, long after the dealership had closed. The two subjects were later determined to be Eric Nourani and Jennifer Dobbins. Deputy Barto pulled over and approached Nourani and Dobbins to determine what they were doing in the closed dealership. Nourani and Dobbins initially spoke with Deputy Barto but then inexplicably took off running. Deputy Barto chased after Nourani and Dobbins and as they turned down an alley way, Nourani and Dobbins stopped running. Nourani then turned around, told Dobbins that Deputy Barto was a "demon" and instructed Dobbins to "kill him." Nourani then charged at Deputy Barto bringing him to the ground. Once Nourani brought Deputy Barto to the ground he began screaming "Kill him! Kill him!", continuing to instruct Dobbins to kill Deputy Barto.

As Nourani continued to attack Deputy Barto, Dobbins knelt down and began grabbing Deputy Barto's right hand to prevent him from using his radio to call for help. **Nourani and Dobbins continued to simultaneously attack Deputy Barto.** Nourani bit off a chunk of Deputy Barto's ear while Dobbins then screamed at Deputy Barto **"I'm going to fucking get rid of you!...You are going to hell! Kill yourself!" and began kicking Deputy Barto in the head.** Nourani then tried to get a hold of Deputy Barto's gun. As seen on video, Dobbins kicked Deputy Barto in the head ***six times*** and Deputy Barto began to lose consciousness. Realizing that Dobbins and Nourani were going to kill him, Deputy Barto fired one round at Dobbins to stop her from kicking him in the head and killing him. Immediately

1 thereafter, nearby construction workers came to Deputy Barto's aid and pulled
2 Nourani off Deputy Barto. Dobbins ultimately died of the gunshot wound.
3 Following this incident Deputy Barto was hospitalized with numerous serious
4 injuries.

5 On June 13, 2024, the Riverside District Attorney's Office filed a criminal
6 Complaint against Eric Nourani in *People of the State of California v. Eric Nourani*,
7 Riverside County Superior Court Case No. RIF2403019. In the criminal case
8 Nourani is charged with Penal Code section 187(a) (murder) for the felony murder
9 of Jennifer Dobbins as well as Penal Code section 187(a)/664(e) (attempted murder
10 on a peace officer), Penal Code section 203 (Mayhem), Penal Code section 69
11 (resisting a peace officer by violence), and Penal Code section 148.1 (resisting arrest
12 causing serious injury to an officer) for his actions against Deputy Barto.
13 Hereinafter referred to as the "Nourani Criminal Matter."

14 Plaintiff John Dobbins thereafter filed this civil action on June 10, 2025 (Dkt.
15 1) alleging that Deputy Barto used excessive force on Decedent Dobbins. Plaintiff
16 has asserted claims for relief under 42 U.S.C. § 1983.

17 Defendants now move for an Order staying this civil action until any charges
18 in the Nourani Criminal Matter that relate to the June 11, 2024 incident have been
19 resolved. Plaintiff's Complaint alleges that Deputy Barto used excessive force on
20 June 11, 2024. Whether the use of force was justified due to Eric Nourani and
21 Jennifer Dobbins' actions is an issue that is the subject of both this civil action and
22 the underlying criminal proceeding. Plaintiffs' Opposition argues that the Nourani
23 Criminal Matter cannot serve as a potential Heck bar to this civil case and that the
24 Nourani Criminal Matter would not enjoin this civil proceeding. Plaintiff's
25 arguments are contrary to the Ninth Circuit precedent in Beets v. Cnty. of Los
26 Angeles, 669 F.3d 1038 (9th Cir. 2012) which established that a third party's
27 criminal action *can* bar a section 1983 wrongful death claim, and well-established
28 case law staying civil cases where there are overlapping legal issues and a

1 substantial risk of inconsistent rulings.

2 **II. A STAY IS WARRANTED WHERE CIVIL DISCOVERY WILL**
3 **INTERFERE WITH THE ONGOING NOURANI CRIMINAL**
4 **MATTER.**

5 A court has discretion to stay civil proceedings “when the interests of justice
6 seem to require such action.” Keating v. Off. of Thrift Supervision, 45 F.3d 322,
7 324 (9th Cir. 1995) (internal alterations and quotations omitted). As set forth by the
8 Ninth Circuit in Keating, Courts look to a myriad of factors to determine whether a
9 stay is appropriate. One factor is “the extent to which the defendant’s fifth
10 amendment rights are implicated.” However, it is far from the only factor where
11 courts must also consider: “(1) the interest of the plaintiffs in proceeding
12 expeditiously with this litigation or any particular aspect of it, and the potential
13 prejudice to plaintiffs of a delay; (2) the burden which any particular aspect of the
14 proceedings may impose on defendants; (3) the convenience of the court in the
15 management of its cases, and the efficient use of judicial resources; (4) the interests
16 of persons not parties to the civil litigation; and (5) the interest of the public in the
17 pending civil and criminal litigation.”

18 Plaintiff’s Opposition argues that the Fifth Amendment rights of Nourani are
19 not implicated in this case, however, that is not the focus of Defendants’ Motion or
20 the reasoning for the stay. The need for a stay in this case is predicated on the fact
21 that this civil case seeks to adjudicate many of the same legal issues that will be
22 adjudicated in Nourani’s Criminal Matter, which creates a significant risk of
23 inconsistent rulings. **“When civil proceedings are related to rulings that will likely
24 be made in a pending or anticipated criminal trial, it is common practice for the
25 court to stay the civil action until the criminal case or the likelihood of a
26 criminal case is ended.”** Green v. Lizarraga, No. 22-CV-1175-DMS-MMP, 2023
27 WL 8255118, at 2 (S.D. Cal. Nov. 28, 2023), report and recommendation adopted as
28 modified, No. 22-CV-1175-DMS-MMP, 2023 WL 8952099 (S.D. Cal. Dec. 28,

1 2023) (internal citations omitted).

2 Plaintiff argues that a stay of this case will cause witness memories to fade
3 however, Nourani's Criminal Matter and this civil case have the same witnesses as
4 they arise out of one event. Thus, any witnesses who will testify in this case will
5 undoubtedly testify in the Nourani Criminal Matter and thus, their testimony will be
6 preserved. Courts have recognized that where a civil case and criminal case involve
7 the same witnesses, "any prejudice to Plaintiff is minimal given that both
8 proceedings involve the similar facts and witnesses, and it is unlikely that evidence
9 will be lost or memories will fade with passage of time." Hunt v. Diaz, No.
10 119CV00504DADSABPC, 2020 WL 8465095, at 3 (E.D. Cal. Oct. 30, 2020).

11 Plaintiff argues that the burden of this civil case is minimal because this civil
12 case does not implicate Plaintiff or Defendant Deputy Barto's Fifth Amendment
13 rights, but this misses the point. Allowing Plaintiff to continue this civil litigation
14 would allow Plaintiff to conduct discovery into the County's criminal investigation
15 of Nourani and discover documents or information that may not be discoverable in
16 the Nourani Criminal Matter. Plaintiff does not deny in his Opposition that Nourani
17 has already shared confidential information with him and there is no doubt he
18 intends to share confidential information with Nourani, thereby allowing Nourani
19 the benefit of civil discovery. There is also very significant risk of inconsistent
20 judicial rulings where Nourani's Criminal Matter presents several overlapping legal
21 issues with this civil case. For example, in the criminal trial, the Court will have to
22 determine whether Deputy Barto had reasonable suspicion to detain Nourani and
23 Dobbins. Conversely, in Plaintiff's Complaint, he alleges that Deputy Barto did not
24 have reasonable suspicion to detain Dobbins and Nourani. See Dkt. 1 at ¶31; 34
25 ("Defendant BARTO did not have probable cause to arrest either of the two
26 individuals and did not have reasonable suspicion to stop either of the two
27 individuals.") This is one of many allegations made in Plaintiff's Complaint that
28 will be determined during the Nourani Criminal Matter.

1 While Plaintiff's Opposition argues that Nourani's Criminal Matter does not
2 implicate the Constitutional issues in this case because Nourani is not being charged
3 with Penal Code section 182 (conspiracy), this argument is irrelevant. Indeed,
4 Plaintiff concedes that "Nourani is charged with a violation of Penal Code §187
5 (murder)...based on a theory that Nourani and Dobbins were co-conspirators in the
6 attempted murder of Deputy Barto (i.e., felony murder rule)." See Opp. At Page 2.
7 The parties agree that Nourani's criminal charges arise out of the same facts and
8 circumstances as the fatal shooting of decedent Dobbins, and that Nourani is alleged
9 to have committed a felony act with Dobbins against Deputy Barto. In deciding
10 whether Nourani is guilty or not guilty of felony murder, assault on a peace officer,
11 or attempted murder on a peace officer, the jury in the Nourani Criminal Matter
12 must also decide key legal issues that are also at issue in this civil case. For
13 example, if Nourani is convicted of Penal Code section 187 for the felony murder of
14 Jennifer Dobbins, this would require a jury finding that Eric Nourani aided and
15 abetted Jennifer Dobbins in an unlawful felony *or* conspiracy, caused the death of
16 Jennifer Dobbins by reckless disregard for human life, **and that Deputy Barto was**
17 **lawfully performing his duties as a peace officer at the time he shot Jennifer**
18 **Dobbins.** See CalCrim Jury Instruction 540B. Indeed, the jury instructions for
19 CalCrim Jury Instruction 540B specifically state as an element, "Officer was a peace
20 officer lawfully performing (his/her) duties as a peace officer; and When the
21 defendant acted, (he/she) knew, or reasonably should have known, that the officer
22 was a peace officer performing his duties."

23 Additionally, in order for Nourani to be held criminally culpable for the
24 killing of Dobbins where Deputy Barto discharged his firearm, the prosecution must
25 prove that Deputy Barto's actions were a **reasonable** response to Dobbins' and
26 Nourani's actions. See People v. Lee, 49 Cal. App. 5th 254, 264, 263 Cal. Rptr. 3d
27 19, 26 (2020) "[W]hen the perpetrator of a crime maliciously commits an act that is
28 likely to result in death, and the victim kills in **reasonable** response to that act, the

1 perpetrator is guilty of murder. ‘In such a case, the killing is attributable, not merely
2 to the commission of a felony, but to the intentional act of the defendant or his
3 accomplice committed with conscious disregard for life.’” See also People v.
4 Concha, 47 Cal. 4th 653, 662, 218 P.3d 660, 665 (2009) (“Thus, the victim's self-
5 defensive killing or the police officer's killing in the performance of his duty cannot
6 be considered an independent intervening cause for which the [criminal] defendant
7 is not liable, for it is a *reasonable* response to the dilemma thrust upon the victim or
8 the policeman by the intentional act of the defendant or his accomplice.” (emphasis
9 added).

10 If a jury finds that Deputy Barto’s actions in shooting decedent Dobbins were
11 *unreasonable*, then Nourani cannot be found guilty of Dobbins’ murder. The
12 reasonableness of Deputy Barto’s actions is also implicated in this civil case where
13 Plaintiff alleges that Deputy Barto used unreasonable force in violation of the Fourth
14 Amendment. Brigham City, Utah v. Stuart, 547 U.S. 398, 403, 126 S. Ct. 1943,
15 1947, 164 L. Ed. 2d 650 (2006) (“...the ultimate touchstone of the Fourth
16 Amendment is ‘reasonableness’”). Thus, it is clear Nourani’s Criminal Matter is
17 necessarily implicated by this civil case where the same legal issues are at play.
18 There is simply no logical or legal way that a jury could find Nourani guilty of the
19 felony murder of decedent Dobbins and also find that Deputy Barto was acting
20 unlawfully when he shot decedent Dobbins. Either Deputy Barto used valid and
21 reasonable self-defense in shooting at decedent Dobbins, or he did not. If Deputy
22 Barto did not use reasonable and legal self-defense in shooting at Dobbins, then
23 Nourani cannot be guilty of her murder. Thus, without a stay of this civil case, there
24 is significant risk of inconsistent rulings between the Nourani Criminal Matter and
25 this civil matter.

26 Similarly, California Courts have repeatedly reiterated that in order to find a
27 person guilty of felony murder they must find the person is the proximate cause of
28 the killing. See People v. Briscoe, 92 Cal. App. 4th 568, 583–84, 112 Cal. Rptr. 2d

1 401, 413–14 (2001) (“The prosecutor must also establish that the defendant's
2 conduct proximately caused the killing. Courts use traditional notions of concurrent
3 and proximate cause in order to determine whether the killing was the result of the
4 defendant's conduct. To be considered the proximate cause of the victim's death, the
5 defendant's act must have been a substantial factor contributing to the result, rather
6 than insignificant or merely theoretical.”) Where Plaintiff has brought a claim for
7 negligent wrongful death alleging that Deputy Barto is the proximate cause of
8 Dobbins’ death, the rulings and findings in Nourani’s Criminal Matter are
9 implicated in this civil case. Thus, a stay of this case until the completion of the
10 Nourani Criminal Matter would solve numerous potential discovery issues and
11 conserve judicial resources. Without a stay, there is a significant risk of inconsistent
12 rulings.

13 Further, Plaintiff’s argument that Defendants have not presented evidence of a
14 conspiracy or Nourani’s guilt and therefore the case should not be stayed is
15 irrelevant. Whether Nourani is innocent or guilty of a crime is for a jury in
16 Nourani’s Criminal Matter to decide and Defendants need not present any evidence
17 of Nourani’s guilt for this case to be stayed.

18 Plaintiff further argues that the ruling in Cunningham supports not staying
19 this civil action. Plaintiffs’ citation to Cunningham v. Gates, 229 F.3d 1271 (9th Cir.
20 2000), as amended (Oct. 31, 2000) ignores that the essence of a Heck bar is a case
21 specific analysis, in other words while the Ninth Circuit found that the
22 circumstances in Cunningham did not bar plaintiffs’ section 1983 complaint, that is
23 not to say the same would apply here. Whether Plaintiff’s claims would in fact be
24 barred under Heck depends on what Nourani is convicted of, what jury instructions
25 were given, etc. This determination cannot be made until the Nourani Criminal
26 Matter is complete.

27 As Ninth Circuit held in Beets, what was decided after Cunningham, a
28 conviction of police shooting victim’s accomplice *can* Heck bar a § 1983 claim for

1 excessive force asserted by the victim's parents. See Beets v. Cnty. of Los Angeles,
2 669 F.3d 1038 (9th Cir. 2012). Plaintiff places great emphasis on trying to
3 prematurely argue that this civil case is not currently barred by Heck, but the point
4 of the stay is that Plaintiff's claim *can* be barred pursuant to Heck if Nourani is
5 convicted of a crime. Indeed, even the District Court in Cunningham stayed the civil
6 case pending the completion of the criminal case. See 2:96-cv-02666-CBM-CT at
7 Dkt. 20.

8 Plaintiff's attempt to differentiate Beets also misses the mark. Plaintiff argues
9 that Deputy Barto can be found to have acted lawfully when Nourani was attacking
10 him but unlawfully when he shot decedent Dobbins. This argument ignores the fact
11 that **these things happened at the exact same time**. These are not different
12 occurrences or different time frames; this is one event that all occurred
13 simultaneously.

14 Plaintiffs' citation to Joseph v. City of San Jose, No. 19-CV-01294-LHK,
15 2020 WL 1031899, at 1 (N.D. Cal. Mar. 3, 2020) is also inapposite. In Joseph,
16 plaintiff was cited for numerous municipal codes regarding property violations.
17 Plaintiff Joseph asserted that when officers cited him for the violation of such codes,
18 they also unlawfully searched his property, damaging a wooden screen. Id. Plaintiff
19 Joseph filed a complaint against the City of San Jose alleging numerous violations
20 and seeking declaratory relief from the court that his property did not violate any
21 municipal codes. Id. The Court agreed that all of plaintiff's claims, except for the
22 Fourth Amendment Search claim, must be stayed where the claims implicated the
23 ongoing municipal violations which plaintiff was being prosecuted for. Id. Only the
24 Fourth Amendment search claim was not stayed because even if plaintiff was found
25 to have violated all the municipal codes he was cited for, whether the officers had
26 probable cause or a warrant to enter his home was a separate issue. Thus, the Court
27 held that all claims except for plaintiff's Fourth Amendment seizure claim were
28 stayed pending the resolution of his municipal code violations.

1 Joseph is completely inapplicable to the present case. Here, Plaintiff Dobbins
2 claims that Deputy Barto used excessive force against decedent Dobbins. The
3 Riverside District Attorney has filed criminal charges against Nourani asserting that
4 Deputy Barto acted lawfully and that Nourani is criminally liable for the felony
5 murder of decedent Dobbins. All of Plaintiff's civil claims are therefore implicated
6 in the Nourani Criminal Matter. If in fact Deputy Barto was acting unlawfully and
7 outside the scope of his Constitutional authority as a peace officer, then Nourani
8 cannot be criminally liable for the felony murder of Decedent Dobbins. Similarly, if
9 Nourani is found guilty of assault of a peace officer or attempted murder or a peace
10 officer, this would require a finding that Deputy Barto was acting lawfully at the
11 time of the assault, which is the exact same time that Deputy Barto shot decedent
12 Dobbins. Indeed, Nourani could argue at his trial that his attack on Deputy Barto
13 was lawful in defense of decedent Dobbins. While Defendants do not believe the
14 evidence would support such a theory, such an argument by Nourani would again
15 require a jury finding that Deputy Barto was using reasonable force against
16 Dobbins. Thus, a stay of this case until the completion of the Nourani Criminal
17 Matter would prevent the risk of inconsistent judicial rulings.

18 **III. PURSUANT TO THE *YOUNGER* ABSTENTION DOCTRINE, THE**
19 **CASE SHOULD BE STAYED UNTIL ERIC NOURANI'S STATE**
20 **CRIMINAL PROCEEDING HAS CONCLUDED**

21 In Younger v. Harris, 401 U.S. 37 (1971), the U.S. Supreme Court espoused a
22 strong federal policy against federal-court interference with pending state judicial
23 proceedings, absent extraordinary circumstances. Middlesex County Ethics
24 Committee v. Garden State Bar Ass'n, 457 U.S. 423, 431 (1982). Where certain
25 factors are met, a federal court must abstain and allow the state court to adjudicate all
26 claims, state and federal. Younger at 49-53. The underlying purpose of this
27 abstention doctrine is to avoid unnecessary conflict between state and federal
28 governments, and in matters of special interest to the states, to allow the states the

1 opportunity to adjudicate constitutional issues. United States v. Morros, 268 F.3d
2 695, 707 (9th Cir. 2001); M&A Gabae v. Community Redevelopment Agency of
3 City of Los Angeles, 419 F.3d 1036, 1040 (9th Cir. 2005). It is not a jurisdictional
4 restraint but arises from “strong policies counseling against the exercise of such
5 jurisdiction where particular kinds of state proceedings have already been
6 commenced”. Ohio Civil Rights Commission v. Dayton Christian Schools, Inc., 477
7 U.S. 619, 626 (1986).

8 In civil cases, Younger abstention is appropriate only when state proceedings:
9 (1) are ongoing, (2) involve state's interest in enforcing orders and judgments of its
10 courts, (3) implicate important state interest, and (4) allow litigants to raise federal
11 challenges. ReadyLink Healthcare, Inc. v. State Compensation Ins. Fund, 754 F.3d
12 754, 759 (9th Cir. 2014) (internal citations omitted). If these four threshold elements
13 are met, courts “then consider whether the federal action would have the practical
14 effect of enjoining the state proceedings and whether an exception to *Younger*
15 applies.” Id. at 759.

16 Plaintiff’s Opposition does not dispute that the Nourani Criminal Matter is
17 ongoing and involves the state’s interest. Plaintiff only argues that he cannot raise
18 challenges in the Nourani Criminal Matter and that this civil case is not implicated in
19 the Nourani Criminal Matter. While Plaintiff is not a party to the Nourani Criminal
20 Matter, he is an alleged victim of the Penal Code section 187(a) charge for the felony
21 murder of Jennifer Dobbins where Plaintiff John Dobbins is Jennifer Dobbins’
22 surviving family. Plaintiff will have the opportunity to address his grievances as an
23 alleged victim during the Nourani Criminal Matter. Moreover, a stay of this case
24 will not prevent Plaintiff from addressing the issues raised in his Complaint via this
25 civil action once the Nourani Criminal Matter is resolved.

26 Additionally, Plaintiff’s federal complaint would interfere with the state
27 proceedings by inserting the federal court into the ordinary course of state
28 proceedings and, if permitted, would threaten the autonomy of the state court.

1 Thomas v. Melendez, 2016 WL 7116720, at 6 (E.D. Cal. Dec. 7, 2016). Allowing
2 this federal action to continue before the criminal trial is resolved would necessarily
3 require this Court to intrude upon the state court system, risking the danger of
4 contradictory decisions, and may effectively enjoin the pending state court
5 proceedings on Nourani's Criminal Matter. For example, as discussed above, in the
6 criminal trial, the Court will have to determine whether Deputy Barto had
7 reasonable suspicion to detain Nourani and Dobbins. Conversely, in Plaintiff's
8 Complaint, he alleges that Deputy Barto did not have reasonable suspicion to detain
9 Dobbins or Nourani. See Dkt. 1 at ¶31; 34 ("Defendant BARTO did not have
10 probable cause to arrest either of the two individuals and did not have reasonable
11 suspicion to stop either of the two individuals.") This is one of many allegations
12 made in Plaintiff's Complaint that will be determined during the Nourani Criminal
13 Matter. Plaintiff's federal complaint would interfere with the state proceedings by
14 inserting the federal court into the ordinary course of state proceedings and, if
15 permitted, would threaten the autonomy of the state court.

16 Plaintiff further argues that Defendants lack standing to bring this Motion
17 because they assert only the District Attorney could seek a stay of this civil case.
18 Plaintiff provides no legal authority for this claim, and such an assertion is contrary
19 to case law where courts routinely stay cases pending a parallel criminal case
20 without the District Attorney requesting them to do so. Additionally, Plaintiff asserts
21 a stay in this case would create "dangerous precedent" but civil cases are routinely
22 stayed where they implicate ongoing criminal proceedings, this is not a new or novel
23 legal concept. See Green v. Lizarraga, No. 22-CV-1175-DMS-MMP, 2023 WL
24 8952099, at 3 (S.D. Cal. Dec. 28, 2023) (Granting motion to stay pending criminal
25 case brought by correctional deputy defendants. "The Court **STAYS** all proceedings
26 in this case through the conclusion of the criminal trial in *People v. Green*, No.
27 JCF006108 or until February 2, 2024."); Bass v. San Bernardino Cnty. Sheriff's
28 Dep't, No. EDCV191443JVSKK, 2020 WL 5260486, at *2 (C.D. Cal. July 20,

2020) (Same “This action is ordered STAYED pending the completion of the criminal proceedings against Plaintiff in the Superior Court of California, San Bernardino County, Case No. FSB19001352.”); Morales v. Cate, No. C 11-05211 EJD (PR), 2012 WL 3249488, at *2 (N.D. Cal. Aug. 7, 2012) (Same. “Accordingly, Defendants' motion for stay is GRANTED. The instant federal action will be stayed until final judgment in the state court is rendered.”)

IV. CONCLUSION

For the forgoing reasons, Defendants respectfully request that this Court issue an Order staying this civil case until the completion of the Nourani Criminal Matter.

Dated: November 10, 2025

BURKE, WILLIAMS & SORESENSEN, LLP

By: /s/ Caylin W. Jones
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